Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 101 of the Commission's Rules to Increase Spectrum Use Through More Flexible Antenna Rules for the 10.7-11.7 GHz Band	)	RM-11043

Comments of Comsearch

Comsearch, a division of Andrew Corporation specializing in spectrum management of terrestrial microwave, satellite, and mobile telecommunications systems, hereby respectfully submits the following comments in response to the above captioned Petition for Rulemaking.

In the Petition, FiberTower requests modifications to the antenna standards of Part 101 to allow usage of 2 foot diameter antennas in the 11 GHz band instead of the 4 foot diameter antennas required by the current rules. Smaller antennas are cheaper, easier to install, and have less visual impact. However, to make these benefits available to FS licensees, the Commission would have to relax the antenna beamwidth and sidelobe standards, and these changes could lead to a greater potential for interference among FS systems and into earth stations that share the band.

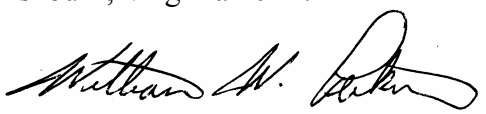
To mitigate concerns about increased interference, FiberTower proposes that the coordination rules should be changed so that licensees would only be able to object to interference into a small antenna to the extent that it would exist if they used a 4 foot diameter antenna, and would have to reduce interference from a small antenna to the level that would exist with a 4 foot diameter

antenna. FiberTower also proposes more stringent Category B radiation pattern standards between 100° and 180°.

We believe that FiberTower's proposals merit further consideration in a rulemaking proceeding. FiberTower's clear intent is to suggest rules that would make FS usage of the band as easy and inexpensive as possible while minimizing or eliminating any adverse impact on other FS and earth station users. While we believe that the antenna pattern requirements and coordination rules proposed by FiberTower must be carefully reviewed, and that additional mitigation options such as a power or EIRP tradeoff could be considered, we are optimistic that rules for small antennas could be written that would minimize the interference impact and avoid placing any users of the band at a disadvantage.

Respectfully Submitted,

COMSEARCH
19700 Janelia Farm Boulevard
Ashburn, Virginia 20147



Prepared by:_____
William W. Perkins
Principal Engineer

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